

**JACKIE L. ROBINSON  
IN PRO PER**

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***for Defendants:***

JACKIE ROBINSON, an individual, ALL  
NET, LLC, a Nevada Limited Liability  
Company; DRIBBLE DUNK, LLC, a  
Nevada Limited Liability Company

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TACSIS APC, a California corporation.  
and KENT LIMSON, an individual,

Plaintiffs  
v.

CASE NO.: **2:2024-cv-02284**

**MOTION FOR CONTINUANCE**

JACKIE ROBINSON, an individual; ALL  
NET LAND DEVELOPMENT, LLC, a  
Nevada Limited Liability Company; ALL  
NET, LLC, a Nevada Limited Liability  
Company; DRIBBLE DUNK, LLC, a  
Nevada Limited Liability Company; AGS  
ASSURETY, LLC, a Nevada Limited  
Liability Company; TIMOTHY J.  
ARELLANO, an individual; DAVID  
LOWDEN, an individual; MESSNER  
REEVES LLP, a Colorado Limited  
Liability Partnership; TORBEN WELCH,  
an individual; LORING JACOBS, an  
individual, and DOES 1 THROUGH 100  
INCLUSIVE,

DEFENDANTS.

COMES NOW DEFENDANTS JACKIE ROBINSON, ALL NET LAND DEVELOPMENT, LLC, ALL NET, LLC, AND DRIBBLE DUNK, LLC (COLLECTIVELY “DEFENDANTS”) AND HEREBY MOVE THIS COURT FOR A CONTINUANCE OF THIRTY (30) DAYS OF ALL CURRENT DEADLINES IN THIS CASE, PURSUANT TO RULE 6(B)(1) OF THE FEDERAL RULES OF CIVIL PROCEDURE, AND IN SUPPORT THEREOF STATE AS FOLLOWS:

1. **Counsel Retention:** Defendants are in the process of retaining Gary S. Lincenberg of Bird, Marella, Rhow, Lincenberg, Drooks & Nessim, LLP, located at 1875 Century Park East, 23rd Floor, Los Angeles, California 90067-2561, as their legal counsel. Mr. Lincenberg’s contact details are as follows: phone (310) 201-2100, email glincenberg@birdmarella.com, website www.birdmarella.com.
2. **Circumstances Necessitating Continuance:** Defendants are attempting to retain Mr. Lincenberg and Mr. Bird of Bird Marella. Both Mr. Lincenberg and Mr. Bird suffered losses in the Palisades fire. So, Defendants are requesting additional time.
3. **Good Cause for Continuance:** Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure provides that a court may, for good cause, extend deadlines if a request is made before the expiration of the original deadline.
4. **Equity and Justice Favor the Granting of This Motion:** A continuance will not prejudice the Plaintiffs or the progression of this case. Instead, it will ensure that Defendants’ newly retained counsel can adequately prepare, review the case materials, and address this matter thoroughly.

1       **5. Requested Relief:** In light of the extraordinary circumstances and the principles of  
2       fairness and equity, Defendants respectfully request a 30-day continuance of all current  
3       deadlines in this case, including but not limited to deadlines for filing responsive  
4       pleadings, discovery deadlines, and any scheduled hearings.

5       **6. Proposed Order:** A proposed order granting this motion is attached hereto as Exhibit A  
6       for the Court's convenience.

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9       WHEREFORE, Defendants respectfully request that this Court grant their motion and extend all  
10      deadlines by thirty (30) days to allow Defendants' counsel adequate time to recover and prepare.

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12      Respectfully submitted this January 21st, 2025.

13      **Defendants, acting In Pro Per**

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15      By: Jackie L. Robinson  
16      **Jackie L. Robinson**

17      **Individually and as Representative of All Net, LLC,**  
18      **and Dribble Dunk, LLC**

19      CERTIFICATE OF SERVICE I hereby certify that a true and correct copy of the foregoing  
20      motion was served on all counsel of record via the Court's CM/ECF system on this January 21st,  
21      2025.

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24      By: Jackie L. Robinson  
25      **Jackie L. Robinson, Individually and as Representative of All Net, LLC,**  
26      **and Dribble Dunk, LLC**  
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